

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

IN RE:	X	
	X	
ADVANCED SOLIDS CONTROL, LLC	X	CASE NO. 16-52748-RBK
	X	
DEBTOR	X	CHAPTER 11

**MOTION OF ADVANCED SOLIDS CONTROL, LLC FOR AUTHORIZATION TO
SELL PERSONAL PROPERTY FREE AND CLEAR OF ALL LIENS, CLAIMS AND
ENCUMBRANCES TO PORTABLE MUD SYSTEMS, INC.**

**THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO
YOUR INTERESTS.**

**IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21)
DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED
HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD.**

**A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE
HELD.**

TO THE HONORABLE RONALD B. KING, CHIEF JUDGE,
UNITED STATES BANKRUPTCY COURT:

NOW COMES, Advanced Solids Control, LLC, Debtor-in-Possession in the above styled and numbered Chapter 11 bankruptcy case, and files this its Motion For Authorization to Sell Personal Property Free and Clear of All Liens, Claims and Encumbrances to Portable Mud Systems, Inc., and in support thereof would respectfully show the Court the following:

1. On December 2, 2016, Advanced Solids Control, LLC (hereinafter called "Debtor") filed its voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Western District of Texas, San Antonio Division.

2. The assets proposed to be sold are described and scheduled on Exhibit "A" attached hereto. The Debtor believes the sales price set forth on Exhibit "A" attached hereto approximates the market value of the items proposed to be sold herein.

3. The Debtor proposes to sell the personal property to Portable Mud Systems, Inc. (who is not related to the Debtor) for a lump sum cash payment in the amount of \$106,500.

4. All items proposed to be sold herein, with the exception of the 2011 2500 Chevrolet Silverado Truck (Vin # xxxxxxxxx2484), are pledged as collateral to WTF Rentals, LLC. WTF Rentals, LLC filed its secured Proof of Claim No. 26 in the amount of \$3,263,549.10 on April 10, 2017, with the appropriate security documents supporting its secured claim attached to the Proof of Claim.

5. The Debtor believes that the proposed sale of the equipment set forth on Exhibit "A" attached hereto generates a reasonable value based upon the assets proposed to be sold and their marketability. The Debtor has been marketing the equipment to a number of parties, several of whom toured the equipment at the Debtor's yard in New Mexico. The Debtor received several low ball offers which it declined. An appraisal of the equipment is in process.

6. The proceeds from the sale of the 2011 2500 Chevrolet Silverado Truck (Vin # xxxxxxxxx2484) will be used by the Debtor in its reorganization efforts/payment of creditors of the Estate. All additional sale proceeds are to be paid to WTF Rentals, LLC as a partial payment on WTF Rentals, LLC's secured claim.

7. The Debtor is requesting that the sale of the equipment as described in Exhibit "A" attached hereto to Portable Mud Systems, Inc. be free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code.

8. A copy of the Order uploaded with this Motion is attached hereto.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that the Court authorize it to sell free and clear of all liens, claims and encumbrances pursuant to §363 of the U.S. Bankruptcy Code, the personal property set forth on Exhibit "A" attached hereto to Portable Mud Systems, Inc. in exchange for a lump sum cash payment in the amount of \$106,500, pursuant to the terms set forth above, and for such other and further relief to which the Debtor may show itself entitled.

Date: June 22, 2017.

RESPECTFULLY SUBMITTED,

/s/ William R. Davis, Jr.

WILLIAM R. DAVIS, JR.

State Bar No. 05565500

LANGLEY & BANACK, INC.

745 E. Mulberry, Suite 900

San Antonio, TX 78212

(210) 736-6600

Email: wrDavis@langleybanack.com

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2017, a true and correct copy of the above and foregoing instrument was mailed, first class, postage prepaid to the attached notice list.

/s/ William R. Davis, Jr.

WILLIAM R. DAVIS, JR.

Advanced Solids Control, LLC
c/o Mr. Lynn Frazier
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405

U.S. Trustee
P.O. Box 1539
San Antonio, TX 78295-1539

Eddy County Treasurer
101 W. Greene, Suite 117
Carlsbad, NM 88220

First National Bank of Beeville
400 E. Houston St.
Beeville, TX 78102

Midland Central Appraisal District
P.O. Box 908002
Midland, TX 79708

Midland County
c/o Laura J. Monroe
P.O. Box 817
Lubbock, TX 79408

Nueces County
P.O. Box 2810
Corpus Christi, TX 78403

Darin Jerle Harding
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Sentrimax Centrifuges, Inc.
108 Sentry Drive
Mansfield, TX 76063

Gary Sweetman
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Portland, TX 78374

Magnum Oil Tools Int'l, Ltd.
5655 Bear Lane, Suite 100
Corpus Christi, TX 78405

Crain, Caton & James
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Houston, TX 77010-4035

Stang Automation, Inc.
100 Pointe Marcelle Beaumont
Alberta T4X 0G2 Canada

Ber Mar Rewind, Ltd.
9609 109 Street
Grand Prairie AB T8V 4E3 Canada

Kirby-Smith Machinery, Inc.
P.O. Box 270360
Oklahoma City, OK 73137

Williams Scotsman, Inc.
P.O. Box 91975
Chicago, IL 60693-1975

Tucker Albin & Assoc., Inc.
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Richardson, TX 75080

Harvey Fuels, Inc.
P.O. Box 8026
Ruidoso, NM 88355

Forrest Tire, Inc.
P.O. Box 1778
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ASK Environmental Equipment
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